Monthly Oversight Report 37
ACS NPL Site
Griffith, Indiana
December 27, 2003 - January 30, 2004

Monthly Oversight Summary Report No. 37
ACS Superfund Site WA57, 46526.238

Reporting Period: Month of January (December 27, 2003 - January 30, 2004).
BVSPC O/S Dates: January 8 and 22, 2004.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	3	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	General Contractor
Ryan Construction	2	General Contractor
Simalabs	2	GWTP Sampling Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza operated the Durr thermal oxidizer unit 1 intermittently during the reporting period, processing vapors from the Off-Site Containment Area in-situ soil vapor extraction system.
- Ryan Construction repaired holes in the Durr thermal oxidizer unit 1 scrubber and replaced the natural gas valve to the Durr thermal oxidizer.
- Montgomery Watson Harza operated the Global thermal oxidizer unit 2 during the reporting period, except on January 29, 2004, when the unit shut down because of extreme cold weather.
- Montgomery Watson Harza reported that noticeable odors were observed in the groundwater treatment plant from an oily product that is being drawn into the system from the On-Site Containment Area Still Bottoms Pond Area.
- The groundwater treatment plant effluent exceeded the discharge limit of 5 ug/L for methylene chloride.
- Simalabs collected routine samples from the groundwater treatment plant for process performance monitoring and for analysis for methylene chloride.
- Montgomery Watson Harza began operating the groundwater treatment plant in recirculation mode on January 23, 2004.
- Ryan Construction repaired heaters in the groundwater treatment plant.
- Austgen evaluated chipping the wood logs located on the Off-Site Containment Area cover for use in wetland access paths.

- Montgomery Watson Harza reported that it will resume compensating the farmer who rents the field southeast of the site for crop damage where several monitoring wells are located and are sampled semiannually.
- Montgomery Watson Harza held biweekly construction coordination meetings on January 8 and 22, 2004.

Activities Performed:

Montgomery Watson Harza (MWH) resumed operating the Durr thermal oxidizer unit 1 after reconfiguring the scrubber piping, processing vapors from the Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) system. During operation, MWH observed elevated photoionization detector (PID) readings around the scrubber unit. MWH ceased operating the system on January 5, 2004, and Ryan Construction repaired several holes in the scrubber unit and replaced the natural gas supply valve. MWH reported that it will install a liner in the scrubber unit to prevent additional damage to the shell. MWH resumed operating the thermal oxidizer on January 12, 2004, and continued ambient air monitoring around the scrubber. MWH operated the Durr thermal oxidizer unit 1 intermittently during the reporting period until January 29, 2004, when the unit was unable to maintain the operating temperature for the combustion chamber because of several leaks in welds on the oxidizer's shell. MWH removed a portion of the shell and reported that it believes that water is condensing and freezing in the oxidizer and damaging some of the welds. MWH reported that the heat exchanger within the unit appears to be intact. MWH reported that it will proceed to disassemble and evaluate the damage to the unit in the upcoming weeks.

MWH operated the Global thermal oxidizer unit 2 throughout the reporting period except on January 29, 2004. On January 29, 2004, MWH reported that the unit registered several system faults. MWH was unable to restart the system until the next day when the temperature was warmer. MWH believes that the extreme cold weather caused the unit to malfunction.

MWH processed vapors from the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) through the Global thermal oxidizer unit 2 during the reporting period. MWH ceased operating the ONCA SBPA ISVE system on January 30, 2004. MWH reported that it stopped the system because of low vapor recovery and in order for the water table in the area to return to its static elevation without influence from the ISVE system. MWH reported that it will continue to focus its dewatering efforts in the ONCA SBPA and that it will measure the water levels in the ISVE system wells in upcoming weeks.

MWH reported that it observed noticeable volatile organic compound (VOC) odors within the groundwater treatment plant (GWTP). MWH performed air monitoring with a PID and believes that the majority of the odors are emanating from the lamella clarifier where an oily product from the ONCA SBPA is present. MWH reported that it is working with Ryan Construction to have a Plexi-Glass cover installed over the lamella clarifier to reduce VOC emissions from the unit. MWH continued to perform air monitoring within the GWTP with the PID and ventilating the GWTP as necessary.

MWH reported that the December effluent compliance sample from the GWTP exceeded the effluent discharge limit of 5 ug/L for methylene chloride. MWH collected a second sample from the GWTP effluent on January 14, 2004, for analysis by CompuChem, the laboratory that performed the original analysis. MWH reported that the concentration of methylene chloride detected in the second sample also exceeded

the discharge limit at 11 ug/L. MWH reported that its approved laboratory, CompuChem, informed it that the laboratory had received several batches of highly contaminated material for analysis which may have resulted in cross contamination. MWH decided to collect a third sample from the GWTP for analysis by Simalabs to confirm whether the detection of methylene chloride is a laboratory contaminant or a valid result. Simalabs collected a sample from the GWTP effluent for analysis on January 21, 2004. MWH reported that the results from the third sample did detect methylene chloride at a concentration greater than the discharge limit. MWH proceeded to begin operating the GWTP in recirculation mode on January 23, 2004. MWH reported that based on the process performance monitoring, methylene chloride is being removed throughout the system, but its concentration increases after the water passes through the carbon vessels. MWH believes that the carbon in the vessels is not longer functional and that fresh carbon will likely remove the methylene chloride from the effluent stream. MWH scheduled a carbon change out for February 3, 2004.

Ryan Construction repaired several heaters in the GWTP.

Austgen evaluated chipping the wood logs staged on the OFCA cover. MWH reported that it expects to spread the wood chips in order to maintain the pathways that were cleared for better access to monitoring wells.

MWH reported that the farmer who rents the farmland southeast of the site contacted MWH regarding damage to his crops from monitoring well sampling activities. MWH reported that it will resume compensating the farmer for the damage to the fields from its sampling activities.

Black & Veatch Special Projects Corp. (BVSPC) attended two biweekly construction coordination meetings held at the site on January 8 and 22, 2004.

Attached are BVSPC weekly reports No. 148 through 152, correspondence, log book notes, and photographs of the daily activities. BVSPC's crew conducted oversight of the major field activities on January 8 and 22, 2004. BVSPC's crew attended two construction coordination meetings at the site on January 8 and 22, 2004.

Topics of Concern:

- MWH reported that the December effluent sample from the GWTP exceeded the effluent discharge limit for methylene chloride and that subsequent sampling activities have confirmed the exceedence.

Concern Resolution:

- MWH began operating the GWTP in recirculation mode and will change the carbon in the carbon vessels on February 3, 2004.

Upcoming Activities:

- MWH to change the carbon in the carbon vessels on February 3, 2004.
- Ryan Construction to install a cover over the lamella clarifier to reduce VOC emissions from this unit.

- MWH to disassemble the Durr thermal oxidizer unit 1 in order to evaluate damage to the unit.
- MWH to line the Durr thermal oxidizer unit 1 scrubber.
- MWH to continue operating the OFCA and resume operating the ONCA SBPA ISVE systems.
- MWH to remove and clean the pumps in the ONCA SBPA ISVE system dual phase extraction wells.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.

Signature: Leigh Peters Date: February 5, 2004

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Weekly Oversight Summary Report No. 148
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of December 29, 2003.
BVSPC O/S Dates: Cancelled because of limited site activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza resumed operating the Durr thermal oxidizer unit 1 after reconfiguring the scrubber piping, processing vapors from the Off-Site Containment Area in-situ soil vapor extraction system.
- Montgomery Watson Harza continued operating the groundwater treatment plant.
- Montgomery Watson Harza continued operating the On-Site Containment Area Still Bottoms Pond Area in-situ soil vapor extraction system, processing vapors through the Global thermal oxidizer unit 2.

Activities Performed:

Montgomery Watson Harza (MWH) resumed operating the Durr thermal oxidizer unit 1 after Ryan Construction reconfigured the piping for the scrubber. MWH processed vapors from the Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) system through the Durr thermal oxidizer unit 1. MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) ISVE system, processing vapors through the Global thermal oxidizer unit 2. MWH reported that it continued to operate the ISVE systems with 17 wells online in the OFCA and 20 wells online in the ONCA SBPA.

MWH reported that it continued to operate the groundwater treatment plant (GWTP) between 30 and 40 gpm. MWH reported that it continues to focus its dewatering efforts in the ONCA SBPA in order to lower the water table to the target elevation.

Topics of Concern:

- None to report.

Concern Resolution:

- None to report.

Upcoming Activities:

- MWH to continue operating the GWTP and OFCA and ONCA SBPA ISVE systems.
- MWH to investigate benzene levels in the lower aquifer below the wetlands area.

Signature: Leigh Peters Date: January 9, 2004

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Weekly Oversight Summary Report No. 149
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of January 5, 2004.
BVSPC O/S Dates: January 8, 2004 (Ms. Peters).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Ryan Construction	2	General Contractor
Simalabs	2	GWTP Sampling Contractor
Austgen	1	General Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza ceased operating the Durr thermal oxidizer unit 1 because of vapors detected around the scrubber unit.
- Ryan Construction began repairing seals in the Durr thermal oxidizer unit 1.
- Simalabs collected routine samples from the groundwater treatment plant and the Global thermal oxidizer unit 2.
- Montgomery Watson Harza continued operating the groundwater treatment plant and the Global thermal oxidizer unit 2.
- Austgen evaluated chipping the logs located on the Off-Site Containment Area cover.
- Montgomery Watson Harza held the bi-weekly construction coordination meeting on January 8, 2004.

Activities Performed:

Montgomery Watson Harza (MWH) ceased operating the Durr thermal oxidizer unit 1 on January 5, 2004. MWH reported that it observed elevated readings while performing ambient air monitoring around the scrubber with a photoionization detector (PID). Ryan Construction began repairing the leaks in the scrubber. MWH reported that the oxidizer chamber is having difficulty maintaining the operating temperature. MWH believes that the natural gas supply to the oxidizer chamber is not sufficient to maintain the operating temperature in the severe cold weather. Ryan Construction replaced the valve for the natural gas supply to provide additional gas supply to the chamber. MWH reported that it expects to resume operating the Durr thermal oxidizer unit 1 on January 12, 2004. MWH reported that it will continue to perform ambient air monitoring around the thermal oxidizer and scrubber units with the PID.

MWH continued to operate the Off-Site Containment Area (OFCA) and On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) ISVE systems, processing vapors through the Global thermal oxidizer unit 2. MWH reported that it continued to operate the ISVE systems with 17 wells online in the OFCA and 20 wells online in the ONCA SBPA.

MWH operated the groundwater treatment plant (GWTP) between 30 and 40 gpm. MWH reported that it is focusing its dewatering efforts in the ONCA SBPA in order to lower the water table to the target elevation. MWH also reported that it has observed product in a few of the ONCA SBPA dual phase extraction (DPE) wells. MWH reported that it plans to remove and clean the pumps from these wells and vacuum the product out of the wells in the future. MWH also reported that it is maintaining 55°F in the activated sludge tank and that it is operating well after the shut down in December to remove the obstruction in the tank.

Simalabs collected samples from the GWTP for routine analysis. Simalabs also collected influent and effluent compliance samples from the Global thermal oxidizer unit 2. MWH reported that samples will be collected from the Durr thermal oxidizer unit 1 next week after MWH resumes operation of the unit.

Austgen was onsite to evaluate chipping the wood logs staged on the OFCA cover. MWH reported that it plans to spread the wood chips in the wetland area in order to maintain the pathways that were cleared to provide better access to the monitoring wells.

Black & Veatch Special Projects Corp. attended the biweekly construction coordination meeting held at the site on January 8, 2004.

Topics of Concern:

- None to report.

Concern Resolution:

- None to report.

Upcoming Activities:

- MWH to resume operating the Durr thermal oxidizer unit 1.
- MWH to continue operating the GWTP and OFCA and ONCA SBPA ISVE systems.
- MWH to remove and clean the pumps in the ONCA SBPA ISVE system DPE wells.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.

Signature: Leigh Peters Date: January 14, 2004

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WEEKLY CONSTRUCTION MEETING MINUTES FOR JANUARY 8, 2004 MEETING AMERICAN CHEMICAL SERVICE, NPL SITE GRIFFITH, INDIANA

MEETING DATE: Thursday, January 8, 2004

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS Site – Site Trailer

ATTENDEES:
Kevin Adler – U.S. EPA
Mark Travers – Environ
Leigh Peters – BVSPC
Pete Vagt – MWH
Rob Adams – MWH
Chris Daly – MWH
Jon Pohl – MWH
Chad Smith – MWH
Doug Hendrich – MWH

TOPICS:

Health and Safety Summary

No health and safety incidents have occurred at the Site since the last meeting on December 11th. Activities at the Site included operation of the groundwater treatment plant (GWTP), operation of the Off-Site Area in-situ soil vapor extraction (ISVE) system and the Still Bottoms Pond Area (SBPA) ISVE system, upgrading of Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1), and maintenance of GWTP components.

Groundwater Treatment Plant (GWTP) Status

The GWTP is currently operating at approximately 30 gallons per minute (gpm). It has been operating at 30 to 40 gpm since the last meeting on December 11th. The heat exchanger continues to maintain the water temperature in the activated sludge plant at 55°F.

Free product has been identified in some of the SBPA dual phase extraction (DPE) wells. The pumps may need to be removed from these wells, cleaned, and reinstalled. In addition, a number of DPE wells will have to be vacuumed to remove the free product.

Off-Site Area/SBPA ISVE Systems

The work to reconfigure Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1) was completed at the end of December and the unit was brought back online on December 26th. Vapors collected from the SBPA ISVE system were directed to Therm Ox 1 on December 29th. An external inspection of the unit was performed with a photoionization detector (PID)

on January 5th to determine if there were any leaks in the unit from the recent work. Minor leaks were detected near the scrubber. Therefore, Therm Ox 1 was shut down until the leaks can be repaired. While Therm Ox 1 is shutdown, the vapors from the SBPA system will be treated by Thermal Oxidizer/Scrubber Unit 2 (Therm Ox 2). Once the repairs on Therm Ox 1 are complete and the unit is brought back online, the vapors from the SBPA system will be directed to this unit. There are currently 20 wells online from the SBPA system and 17 wells online from the Off-Site Area.

Compliance sampling of both thermal oxidizer units was scheduled for January 8th. The samples from Therm Ox 2 have been collected as scheduled and the samples from Therm Ox 1 will be collected when the unit is brought back on line during the week of January 12. The compliance samples collected from each unit will also be used to calculate the current performance of each unit.

Groundwater Monitoring

The Third Quarter 2003 Groundwater Monitoring Report has been approved by the ACS Group and will be submitted to the Agencies on January 9th. A proposal to perform the lower aquifer investigation work is currently being prepared and will be submitted to the Agencies in January.

Chemical Oxidation

A work plan for the chemical oxidation work is being prepared by MWH and will be submitted to the Agencies in January. MWH anticipates performing the work in April or May of 2004 when the water table is predicted to be at it's highest elevation.

Residential Well Sampling

Kevin Adler (U.S. EPA RPM) indicated that after reviewing the data for the recent residential well sampling that many of the volatile organic compounds (VOCs) were flagged "J", indicating that the compounds were detected but at concentrations below the laboratory's reporting limit. Mr. Adler raised the question whether or not there was an issue with the groundwater or if the flags were attributed to the laboratory procedures. MWH will investigate the issue and inform the Agencies of the findings.

Report Schedule

The following reports are scheduled to be submitted to the Agencies in January 2004:

- Groundwater Monitoring Report for Third Quarter 2003 – January 9th
- Final Technical Memorandum for the Off-Site Area ISVE System – January 25th
- Draft Construction Completion Report (CCR) for the Off-Site Area Final Engineered Cover – January 27th
- Final CCR for the Off-Site Area ISVE System – January 27th (if Agency comments are received by January 13th)
- Final Active Treatment Systems Monitoring for First Quarter 2003 – January 27th (if Agency comments are received by January 13th)
- Work Plan for Chemical Oxidation – January
- Proposal for Lower Aquifer Investigation – January

Looking Ahead

January 9, 2004 through January 22, 2004	• GWTP/BWES/PGCS operation • Off-Site and SBPA ISVE Systems operation • Monitoring of the ISVE Systems
Health and Safety Items to Monitor	• Working in cold weather • Slip and fall hazards due to ice • Vapors that may build up in the GWTP due to closed doors

Next Construction Meeting - Thursday, January 22, 2004, 10 a.m.

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Weekly Oversight Summary Report No. 150
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of January 12, 2004.
BVSPC O/S Dates: Cancelled because of limited site activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
Ryan Construction	1	General Contractor
Simalabs	1	GWTP Sampling Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza resumed operating the Durr thermal oxidizer unit 1 after Ryan Construction repaired holes in the scrubber.
- Montgomery Watson Harza reported that the December effluent sample from the groundwater treatment plant exceeded the effluent discharge limit of 5 ug/L for methylene chloride.
- Montgomery Watson Harza collected a second effluent sample from the groundwater treatment plant for analysis on January 14, 2004.
- Montgomery Watson Harza continued operating the groundwater treatment plant and the Global thermal oxidizer unit 2.

Activities Performed:

Montgomery Watson Harza (MWH) resumed operating the Durr thermal oxidizer unit 1 after Ryan Construction completed repairs to the scrubber. MWH reported that it operated the unit intermittently during the week, processing vapors from the Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) system. MWH also reported that it performed ambient air monitoring around the unit with a photoionization detector and did not observe elevated readings.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) ISVE system, processing vapors through the Global thermal oxidizer unit 2. MWH reported that it continued to operate the ISVE systems with 17 wells online in the OFCA and 20 wells online in the ONCA SBPA.

MWH reported that the December effluent compliance sample from the groundwater treatment plant (GWTP) exceeded the effluent discharge limit of 5 ug/L for methylene chloride. MWH collected a second sample from the GWTP effluent on January 14, 2004, for analysis by CompuChem, the laboratory that

performed the original analysis. MWH reported that the results would be available early next week. MWH continued to operate the GWTP at 30 gpm, focusing its dewatering efforts on the ONCA SBPA.

Simalabs collected samples from the GWTP for routine analysis for process performance monitoring.

Topics of Concern:

- MWH reported that the December effluent sample from the GWTP exceeded the effluent discharge limit for methylene chloride.

Concern Resolution:

- MWH collected a second effluent sample from the GWTP on January 14, 2004, for analysis by CompuChem.

Upcoming Activities:

- MWH to evaluate the detection of methylene chloride above the effluent discharge limits and propose a corrective action.
- MWH to continue operating the GWTP and OFCA and ONCA SBPA ISVE systems.
- MWH to remove and clean the pumps in the ONCA SBPA ISVE system dual phase extraction wells.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.

Signature: Leigh Peters Date: February 5, 2004

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Weekly Oversight Summary Report No. 151
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of January 19, 2004.
BVSPC O/S Dates: January 22, 2004 (Ms. Peters).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	3	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Ryan Construction	1	General Contractor
Simalabs	1	GWTP Sampling Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza reported that effluent samples from the groundwater treatment plant exceeded the effluent discharge limit of 5 ug/L for methylene chloride.
- Montgomery Watson Harza began operating the groundwater treatment plant in recirculation mode on January 23, 2004.
- Montgomery Watson Harza reported that noticeable odors were observed in the groundwater treatment plant from an oily product that is being drawn into the system from the On-Site Containment Area Still Bottoms Pond Area.
- Ryan Construction repaired heaters in the groundwater treatment plant.
- Montgomery Watson Harza continued operating both the Durr thermal oxidizer unit 1 and the Global thermal oxidizer unit 2.
- Montgomery Watson Harza reported that it will resume compensating the farmer who rents the field southeast of the site for crop damage where several monitoring wells are located and are sampled semiannually.
- Montgomery Watson Harza held the biweekly construction coordination meeting on January 22, 2004.

Activities Performed:

Montgomery Watson Harza (MWH) reported that the second effluent sample from the groundwater treatment plant (GWTP) exceeded the discharge effluent limit of 5 ug/L for methylene chloride. MWH reported that the concentration of methylene chloride detected in the sample collected on January 14, 2004, was 11 ug/L. MWH reported that its approved laboratory, CompuChem, informed it that the laboratory had received several batches of highly contaminated material for analysis which may have resulted in cross

contamination of the samples. MWH decided to collect a third sample from the GWTP for analysis by an outside laboratory to confirm whether the detection of methylene chloride is a laboratory contaminant or a valid result. Simalabs collected a sample from the GWTP effluent for analysis on January 21, 2004. MWH reported that the results from the third sample did detect methylene chloride at a concentration greater than the discharge limit. MWH proceeded to begin operating the GWTP in recirculation mode while it determined a corrective action.

Ryan Construction repaired several heaters in the GWTP. MWH reported that it observed noticeable volatile organic compound (VOC) odors within the GWTP. MWH performed air monitoring with a photoionization detector (PID) and believes that the majority of the odors are emanating from the lamella clarifier where an oily product from the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) is present. MWH reported that it is working with Ryan Construction to have a Plexi-Glass cover installed over the lamella clarifier to reduce VOC emissions from the unit. MWH continued to perform air monitoring within the GWTP with the PID and to ventilate the GWTP as necessary.

MWH continued to operate the Off-Site Containment Area (OFCA) ISVE system, processing vapors through the Durr thermal oxidizer unit 1. MWH reported that it plans to line the inside of the scrubber unit associated with the Durr thermal oxidizer unit 1 to prevent additional holes from forming within the scrubber shell. MWH also continued to operate the ONCA SBPA ISVE system, processing vapors through the Global thermal oxidizer unit 2.

MWH reported that the farmer who rents the farmland southeast of the site contacted MWH regarding damage to his crops from monitoring well sampling activities. MWH reported that it will resume compensating the farmer for the damage to the fields from its sampling activities.

Black & Veatch Special Projects Corp. attended the biweekly construction coordination meeting held at the site on January 22, 2004.

Topics of Concern:

- MWH reported that the December effluent sample from the GWTP exceeded the effluent discharge limit for methylene chloride and that subsequent sampling activities have confirmed the exceedence.

Concern Resolution:

- MWH began operating the GWTP in recirculation mode while it evaluates options for corrective action.

Upcoming Activities:

- MWH to determine a corrective action for the effluent discharge limit exceedence for methylene chloride.
- Ryan Construction to install a cover over the lamella clarifier to reduce VOC emissions from this unit.
- MWH to line the Durr thermal oxidizer unit 1 scrubber.
- MWH to continue operating the OFCA and ONCA SBPA ISVE systems.

- MWH to remove and clean the pumps in the ONCA SBPA ISVE system dual phase extraction wells.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.

Signature: Leigh Peters Date: February 5, 2004

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WEEKLY CONSTRUCTION MEETING MINUTES FOR JANUARY 22, 2004 MEETING AMERICAN CHEMICAL SERVICE, NPL SITE GRIFFITH, INDIANA

MEETING DATE: Thursday, January 22, 2004

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS Site – Site Trailer

ATTENDEES:
Kevin Adler – U.S. EPA
Mark Travers – Environ
Leigh Peters – BVSPC
Pete Vagt – MWH
Todd Lewis – MWH
Rob Adams – MWH
Lee Orosz – MWH
Chris Daly – MWH
Jon Pohl – MWH
Chad Smith – MWH
Doug Hendrich – MWH

TOPICS:

Health and Safety Summary

No health and safety incidents have occurred at the Site since the last meeting on January 8th. Activities at the Site included operation of the groundwater treatment plant (GWTP), operation of the Off-Site Area in-situ soil vapor extraction (ISVE) system and the Still Bottoms Pond Area (SBPA) ISVE system, and maintenance of GWTP components.

Noticeable volatile organic compound (VOC) odors in the GWTP have prompted continued air monitoring in the building and increased ventilation of the plant. The air monitoring has indicated that the sources of VOCs were from a few tanks that had loose seams and from the lamella clarifier, where free product has accumulated. The seams on the identified tanks were sealed. Ryan Construction, Inc. is currently preparing a cost estimate for installing a Plexi-Glass cover over the lamella clarifier. In addition, MWH is currently reviewing options for removing the accumulated free product.

Groundwater Treatment Plant (GWTP) Status

The GWTP is currently operating at 30 gallons per minute (gpm). There have been no issues with the GWTP since the last meeting on January 8th.

On January 13th, MWH received the initial laboratory results for the December effluent sample (collected on December 29th) which indicated a methylene chloride concentration

of 8.5 micrograms per liter (µg/L), exceeding the effluent discharge limit of 5 µg/L. The U.S. EPA was contacted via telephone of the exceedence on January 13th and letter was submitted on January 16th. An additional effluent sample was collected on January 14th and analyzed by CompuChem for VOCs on a rush turn around time. The results of the resample indicated a methylene chloride concentration of 11 µg/L, still exceeding the discharge limit. A second resample was collected by Similabs on January 21st to determine if the elevated methylene chloride results were the result of poor quality assurance/quality control on the laboratory. MWH is also reviewing the operational logs for the time period around the December compliance sample to determine if any fluctuations in the system may have caused the exceedence.

Ryan Construction was onsite repairing the heaters in the GWTP building.

Off-Site Area/SBPA ISVE Systems

Thermal Oxidizer/Scrubber Unit 2 (Therm Ox 2) has operated continuously and has been treating vapors from the SBPA ISVE System. Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1) operated intermittently since the last meeting and has been treating vapors from the Off-Site ISVE System. An inspection of Therm Ox 1 indicated that holes were forming in the interior walls of the scrubber. These holes were patched and the unit was brought back online. MWH is looking into coating the inside of the scrubber in order to prevent future corrosion of the unit. Vapors from the Off-Site ISVE System will be redirected to Therm Ox 2 during installation and curing of the coating in the event that Therm Ox 1 is coated.

Field Damage

MWH was approached by a farmer, who is renting the property where several groundwater monitoring wells are located, regarding damage that had been done to the crops in this field. Lee Orosz and Chad Smith inspected the damage and verified that it had been caused by MWH activities. Mr. Orosz and Mr. Smith informed the farmer that he would be adequately compensated for the damage. Compensation for similar damage has been paid in the past and MWH will continue to do so in the future where such damage cannot be avoided.

Wetlands Access Paths

A letter was sent to the Agencies on January 20th regarding the installation of access paths from the GWTP building to several wells in the wetlands. A five-foot wide path would be cut through the woods and covered with woodchips from the logs that are being stored in the Off-Site Area.

Report Schedule

The following reports are scheduled to be submitted to the Agencies in January 2004:

- Final Technical Memorandum for the Off-Site Area ISVE System – Waiting for Agency Comments

- Draft Construction Completion Report (CCR) for the Off-Site Area Final Engineered Cover – Waiting for Agency Comments
- Final CCR for the Off-Site Area ISVE System – Waiting for Agency Comments
- Final Active Treatment Systems Monitoring for First Quarter 2003 – Waiting for Agency Comments
- Work Plan for Chemical Oxidation – February 2004
- Proposal for Lower Aquifer Investigation – February 2004

Looking Ahead

January 23, 2004 through February 5, 2004	• GWTP/BWES/PGCS operation • Off-Site and SBPA ISVE Systems operation • Take steps to minimize VOC emissions in the GWTP building • Move logs from the Off-Site Area to the GWTP and chip them • Coat Therm Ox 1 • Routine Maintenance in the GWTP
Health and Safety Items to Monitor	• Working in cold weather • Slip and fall hazards due to ice • Vapors in the GWTP

Next Construction Meeting - Thursday, February 5, 2004, 10 a.m.

JDP/RAA/PJV
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Weekly Oversight Summary Report No. 152
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of January 26, 2004.
BVSPC O/S Dates: Cancelled because of limited site activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza continued to operate the groundwater treatment plant in recirculation mode.
- Montgomery Watson Harza reported that the Durr thermal oxidizer 1 shut down because of leaks in the oxidizer shell.
- Montgomery Watson Harza reported that the Global thermal oxidizer unit 2 shut down on January 29, 2004, because of the cold weather.

Activities Performed:

Montgomery Watson Harza (MWH) continued to operate the groundwater treatment plant (GWTP) in recirculation mode. MWH reported that based on the process performance monitoring, methylene chloride is being removed throughout the system, but its concentration increases after the water passes through the carbon vessels. MWH believes that the carbon in the vessels is not longer functional and that fresh carbon will likely remove the methylene chloride from the effluent stream. MWH scheduled a carbon change out for February 3, 2004.

MWH reported that the Durr thermal oxidizer unit 1 shut down because of its inability to maintain the chamber operating temperature because of leaks in several welds on the shell for the oxidizer. MWH reported that it believes that condensate in the system is freezing within the oxidizer and damaging the welds. MWH removed a portion of the shell and reported that the heat exchange within the oxidizer appears to be intact; however, the shell is not. MWH reported that it will disassemble the unit and evaluate the damage in the upcoming weeks.

MWH reported that the Global thermal oxidizer 2 registered several system faults on January 29, 2004, during extreme cold weather. MWH reported that it was unable to get the system back online on January 29, 2004; however, when MWH restarted the unit on January 30, 2004, it resumed operation. MWH believes that the extreme cold caused the unit to malfunction. MWH began processing the Off-Site Containment Area in-situ soil vapor extraction (ISVE) system vapors through the Global thermal oxidizer unit 2. MWH ceased operating the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA)

ISVE system on January 30, 2004. MWH reported that it stopped the system because of low vapor recovery and in order for the water table in the area to return to its static elevation without influence from the ISVE system. MWH reported that it will continue to focus its dewatering efforts in the ONCA SBPA and that it will measure the water levels in the ISVE system wells in upcoming weeks.

Topics of Concern:

- MWH reported that the December effluent sample from the GWTP exceeded the effluent discharge limit for methylene chloride and that subsequent sampling activities have confirmed the exceedence.

Concern Resolution:

- MWH began operating the GWTP in recirculation mode and will change the carbon in the carbon vessels on February 3, 2004.

Upcoming Activities:

- MWH to change the carbon in the carbon vessels on February 3, 2004.
- Ryan Construction to install a cover over the lamella clarifier to reduce VOC emissions from this unit.
- MWH to disassemble the Durr thermal oxidizer unit 1 in order to evaluate damage to the unit.
- MWH to line the Durr thermal oxidizer unit 1 scrubber.
- MWH to continue operating the OFCA and resume operating the ONCA SBPA ISVE systems.
- MWH to clean and remove the pumps in the ONCA SBPA ISVE system dual phase extraction wells.
- MWH to investigate benzene levels in the lower aquifer below in wetlands area.

Signature: Leigh Peters Date: February 5, 2004

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The Monthly ISVE compliance Samples were collected on 12/5/03.

GWTP Sludge

Filter cake now must be disposed by incineration at Pt. Arthur TX this makes 3 loads to " " "

ISVE

- Ryan is repiping the Durr Thermox Unit #1
- Vitamins installed a new hastelloy Manway on Durr unit
- Plan to have Durr unit operational by ~~June~~ Jan 04
- Austgen added lights near Global unit.

Look Ahead

- Startup of Durr unit
- then inspect Global unit
- Take ISVE Water levels on 12/10/03 & again before Christmas
- Some reports have been delayed

H&S Look Ahead

Start Durr Unit w/ clean water
well water level reading

Residential Well - All results (PP) are Non Detect - MWH → data review

Next Mtg Jan 8, 2004

1100 Left site for Day Jim Campbell

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1/8/04 Leigh E Peters

0830 Arrive onsite, Overcast, 20-25 °F

Personnel Onsite:

* Doug Hendricks	MWH
Lee Orosz	MWH
Jerry Clark	Ryan
Terry Frisk	Ryan
* Leigh Peters	BVSPC

Ryan Construction working on misc activities on scrubber for Durr thermox. construction meeting scheduled for 1000

0900 Spoke with L. Orosz; Ryan repairing leak in thermox / manway. MWH shut system down after operating 10 days with OFCA vapors to repair leaks. When MWH try to restart, chamber temp not able to reach operating temp, gas limited by valve - Ryan to replace. Austgen onsite to assess chipping wood on OFCA for use on pathways cleared to access Monitoring wells. Sinalabs Onsite for GWTP sampling.

1000 Wkly Const Mtg. Attendees - * on previous, plus (via phone)

Kevin Adler	EPA	Pete Vagt	MWH
Rob Adams	MWH	Chris Daly	MWH
Chad Smith	MWH	Mark Travas	Environ

Leigh E Peters

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1/8/04 Jeff & Peter

H+S: No incidents: Ryan working on Dorr thermox / scrubber

GWTP: @ 30 gpm today; but running 30-40 gpm - focus on ONCA SBPA dewatering. Some product observed in few DPE wells - MW11 will need to remove pump + vacuum out in future. Biotank maintaining 55°F.

ISVE: Dorr Thermox 1 online 12/26; began pulling vapors 12/29 from OFCA. Shut down 1/5 b/c MW11 observed elevated PID readings around scrubber and found leaks in unit. Ryan repairing. MWH expects to restart Dorr on 1/12/04. OFCA (17 wells) and ONCA (20 wells) vapors being treated by Thermox 2. MWH collect air samples at thermox 2 today; Samples of Thermox 1 possibly next week

GW: Sept 03 report to be issued soon. Lower Aquifer proposal and Work Plan / FS for thermox (Spring 04) also to be issued soon. Several 'J' and 'B' qualifiers observed on Residential data - MWH to evaluate +/- historical to see if same situation of "noise" in past

Jeff & Peter

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1/8/04 Jeff & Peter

Look Ahead:

H+S: Winter weather, cold, slips+trips.

Continue air monitoring inside GWTP with PID.

Construction: GWTP/ISVE operation.

PSVP monitoring of ISVE systems 1/13/04

Reports: ONCA ISVE ccr- February

Sept 03 GW sampling - Arw other RTCs.

1025 mtg Conclude. Next mtg 1/22/04 @ 1400.

Ryan continue work on Thermox / Scrubber - NO other site activities for day.

1050 leave site for day

Jeff & Peter 1/8/04.

1/22/04 [illegible]

0845 Overcast; Sunny; 5°F, SE wind.
Personnel Present:

*Lee Grosz	MWH
*Doug Hendricks	MWH
*Todd Lewis	MWH
Jerry Clark	Ryan
Mike Chenoweth	Simalabs
*Leigh Peters	BYSPC

Activities Today:
1. MWH collect weekly water levels
2. Weekly construction Mtg.

0900 Spoke with Todd Lewis. He reported MWH shut down Thermox 2 to repair pinholes in welds; bringing up to temp today. MWH evaluating interior coatings that can be applied to scrubber to prevent future corrosion looking into epoxy, fiberglass. Ryan Construction Repairing heater.

0919 Roll 52 Photo 1 facing S of dark colored floc in clarifier from u/s

0920 Roll 52 Photo 2 facing S of discharge from clarifier to ~~sand filter~~ up T-2

Spoke with L. Grosz - he reported more O/S because of CNCA SBFA

1/22/04 [illegible]

pumping. Simalabs conducting 3rd party sampling of effluent in addition to process sampling. MWH reported compliance detected methylene chloride above effluent limits, confirming by having Simalabs collect samples and analyze for methylene chloride.

0930 Roll 52 Photo 3 showing reconfigured piping for thermox 1 scrubber. Sight glass moved to the pipe.

1000 Weekly Const Mtg. Attendees - * on previous pgs:

Rob Adams MWH

Via phone:

Kevin Adler	EPA	Pete Vogt	MWH
Chris Daly	MWH	Chad Smith	MWH
Jon Pohl	MWH	Mark Travers	Environ

<u>H&S</u>: No issues since 1/8/04. Air monitoring inside GWTP indicate VOCs, Peak of 8 ppm at clarifier, but also 0 ppm. MWH ventilating building. Ryan to install plexiglass over clarifier to reduce emissions. Free product present in clarifier.

<u>GWTP</u>: 30 gpm, no maintenance issues.
Methylene chloride detected by compliance

[illegible]

(46)

1/22/04 [signature]

from December. Going to verify results by Sampling conducted by Simalabs - results today; sample collected 1/21/04. MWH circulated documentation regarding sample results. MWH also reviewing O+M logs. MWH also evaluating recovering the free product.

ISVE Thermox 2 processing ONCA ISVE and T102 vapors. Thermox 1 running periodically, corrosion issues in scrubber; MWH looking at installing liner/coating. MWH bringing thermox 1 up to temp - will continue operation of system through Thermox 1.

MW sampling: MWH working with farmer b/c of wells in corn fields. MWH proposing paths to MWH-ST. To evaluate paths into wetlands.

Look Ahead: Address air emissions in GWTP; More logs from ONCA; Thermox 1 coating for scrubber.

H&S Look Ahead: Air monitoring in GWTP

1040 Mtg Conclude; next mtg 2/5/04 @ 1000.
1100 up into L. Campbell on site activities
1135 Left site for day.

[signature]

2/5/04 [signature] (47)

0830 Arrive onsite; 25° F; Cloudy

Personnel Present:

Doug Henricks	MWH
Lee Orosz	MWH
Leigh Peters	BVSPC

L. Orosz reported carbon changeout on 2/3/04; GWTP in recirc mode, MWH tracking pH to see if can resume discharging effluent to wetlands. MWH observing high pH - to check probe.

0843 Roll 52 Photo 3/4 facing NW of L. Orosz cleaning probe for pH measurement

0845 Roll 52 Photo 5 facing NW showing L. Orosz testing pH probe in buffer solution - MWH to recalibrate.

0900 MWH recalibrating pH probe on effluent discharge line. MWH reported Condensation had been accumulating in thermox 1; unit down; MWH removed portion of cover to heat exchanger.

0905 Roll 52 Photo 6 facing N of Thermox 1 heat exchanger

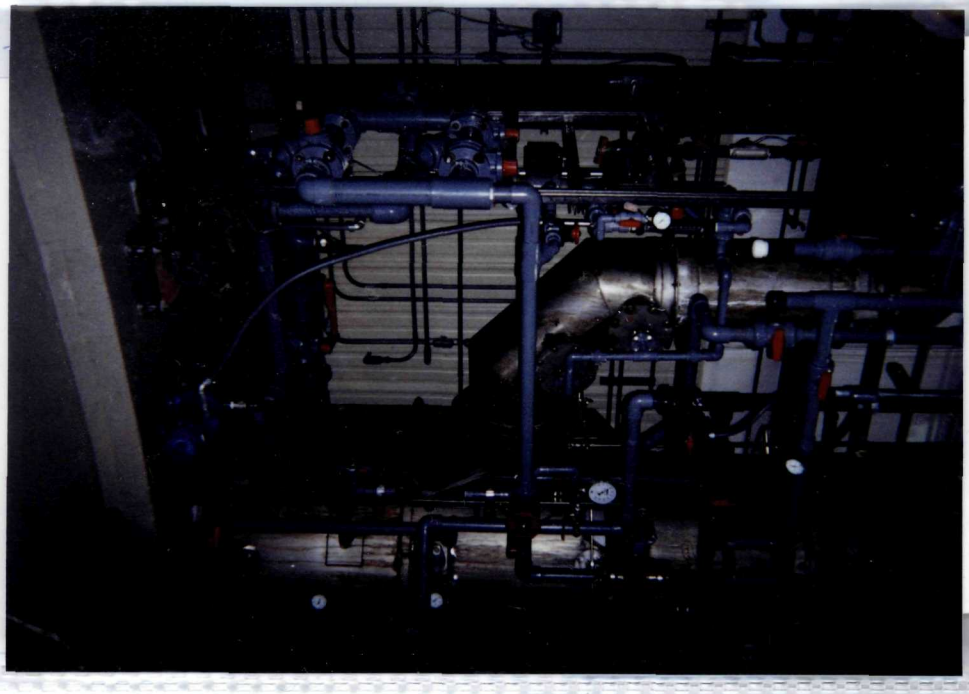
0900 Roll 52 Photo 7 facing N of frozen water in heat exchanger.

0915 Work on reports.

[signature]

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 52 Photo #1
Date: 01-22-04 Time: 09:19
Photographer: Leigh Peters
Description: Photo facing south showing the dark, oily product in the lamella clarifier.

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 52 Photo #2
Date: 01-22-04 Time: 09:20
Photographer: Leigh Peters
Description: Photo facing south showing the discharge water from the lamella clarifier.



Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 52 Photo #3
Date: 01-22-04 Time: 09:30
Photographer: Leigh Peters
Description: Photo facing south showing the reconfigured piping for the scrubber for the Durr thermal oxidizer unit 1.